

# Hospital Price Transparency Requirements

## Quick Reference Checklists

### Overview

In addition to the **8-Step Guide to Making Public Standard Charges for All Items & Services** and the **10-Step Guide to Making Public Standard Charges for Shoppable Services**, these quick reference checklists are meant to assist your hospital’s review of the [Hospital Price Transparency Final Rule](#)<sup>1</sup>.

### Quick Reference Checklists

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### Disclaimer

The information provided in the Quick Reference Checklist is only intended to be a general summary of regulations we promulgated at 45 CFR Part 180. We encourage all users to review those regulations in their entirety, as well as the [CY 2020 Hospital Outpatient PPS Policy Changes and Payment Rates and Ambulatory Surgical Center Payment System Policy Changes and Payment Rates: Price Transparency Requirements for Hospitals to Make Standard Charges Public \(CMS-1717-F2\)](#).

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**Table 1: Is my hospital required to comply?<sup>ii</sup>**

Question	Answer
Is your institution located in any state of the United States of America, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, or the Northern Mariana Islands?	<p>If YES – Continue to next question.</p> <p>If NO – STOP. Your institution does not fall under the definition of hospital and is not required to comply with the Hospital Price Transparency Final Rule.</p>
Is your institution licensed as a hospital or approved as meeting the standards established for such licensing?	<p>If YES – Continue to next question.</p> <p>If NO – STOP. Your institution does not fall under the definition of hospital and is not required to comply with the Hospital Price Transparency Final Rule.</p>
<p>Is your institution federally owned or operated?<sup>iii</sup></p> <p><i>This includes, but is not limited to: facilities operated by the U.S. Department of Veterans Affairs, Military Treatment Facilities operated by the U.S. Department of Defense, and hospitals operated by an Indian Health Program.</i></p>	<p>If YES – STOP. Your institution has been deemed by CMS to be in compliance with the requirements of the Hospital Price Transparency Final Rule.</p> <p>If NO – Your institution <b>falls under</b> the definition of hospital and <b>must comply</b> with the Hospital Price Transparency Final Rule.</p>

**Table 2: Making Public Standard Charges for All Items & Services<sup>iv</sup>**

Machine Readable File	
✓	<b>General</b>
	Has your hospital posted a file of all hospital standard charges for all items and services?
	<p>Is the file specific to the hospital location operating under a single hospital license (or approval)?</p> <p><i>Note: A separate file must be posted for each hospital if there are multiple hospitals operating under a single hospital license with different sets of standard charges.</i></p>
	Does the file clearly indicate the hospital location?
Format	
	Is the file a single digital file?
	Is the file in a machine-readable format (e.g., .XML, .JSON, .CSV)?
	Does the file meet the CMS-specified file naming convention, specifically: <in>_<hospital-name>_standardcharges.[json xml csv]?

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<b>Machine Readable File</b>	
<b>Data Elements<sup>v</sup> (as applicable)</b>	
	Does the file include all individual items and services (including service packages) provided by hospital?
	Does the file include a description for the items and services provided by the hospital?
	Does the file include the gross charge for the items and services provided by the hospital?
	Does the file include the payer-specific negotiated charges with name of the third party payer and plan clearly associated for the items and services provided by the hospital?
	Does the file include the de-identified minimum negotiated charge for the items and services provided by the hospital?
	Does the file include the de-identified maximum negotiated charge for the items and services provided by the hospital?
	Does the file include the discounted cash price for the items and services provided by the hospital?
	Does the file separately list the inpatient setting and outpatient department setting, as applicable, for the items and services provided by the hospital?
	Does the file include any code used by the hospital for purposes of accounting or billing for the items and services provided by the hospital?
<b>Accessibility</b>	
	Is the file posted on a publically available website in a prominent manner?
	Is the file information digitally searchable?
	Is the file available free of charge?
	Is the file accessible without having to register or establish a user account or password?
	Can the file be accessed without submitting personally identifiable information (PII)?
<b>Annual Updates</b>	
	Has the standard charge information in the file been updated within the past 12 months?
	Is the date the information was last updated clearly indicated?

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**Table 3: Making Public Standard Charges for Shoppable Services<sup>vi</sup>**

Shoppable Services	
✓	<b>General</b>
	Has your hospital posted a display of standard charges for a set of shoppable services?
	Is the display specific to the hospital location operating under a single hospital license (or approval)? <i>Note: A separate display must be posted for each hospital if there are multiple hospitals operating under a single hospital license with different sets of standard charges.</i>
	Does the display clearly identify the hospital location?
	<b>Data Elements (as applicable)</b>
	Does the display include the <a href="#">70 CMS-specified shoppable services</a> ? <sup>vii</sup>
	If your hospital does not offer one or more of the 70 CMS-specified shoppable services, does the display clearly indicate that?
	Does the display include additional hospital-selected shoppable services for a combined total of at least 300 shoppable services? <i>Note: If your hospital offers less than 300 shoppable services in total, include as many as are offered.</i>
	Did your hospital select the additional shoppable services based on the utilization or billing rate of the services in the past year?
	Does the display include a plain-language description of each shoppable service?
	Does the display include the payer-specific negotiated charge with the name of the third party payer and plan clearly associated for each shoppable service?
	Does the display include the de-identified minimum negotiated charge for each shoppable service?
	Does the display include the de-identified maximum negotiated charge for each shoppable service?
	Does the display include the discounted cash price for each shoppable service? <i>Note: If the hospital does not offer a discounted cash price, then the undiscounted gross charge should be listed.</i>
	Is each standard charge for each shoppable service grouped together with charges for associated ancillary services, as applicable?
	Does the display include any primary code used by the hospital for purposes of accounting or billing for the shoppable service?
	Does the display list the location where the shoppable service is provided?
	<b>Accessibility</b>
	Is the display posted on a publically available website in a prominent manner?
	Is the display available free of charge?
	Is the display accessible without having to register or establish a user account or password?
	Can the display be accessed without submitting personally identifiable information (PII)?
	Is the display searchable by service description, billing code, and payer?

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Shoppable Services	
Annual Updates	
	Has the standard charge information in the display been updated within the past 12 months?
	Is the date the information was last updated clearly indicated?

**Table 4: Internet-based Price Estimator Tool<sup>viii</sup>**

Estimator Tool	
✓	<i>Alternatively, your hospital can meet the requirements for Making Public Standard Charges for Shoppable Services by maintaining an internet-based price estimator tool.</i>
General	
	Does the tool allow healthcare consumers to, at the time they use the tool, obtain an estimate of the amount they will be obligated to pay the hospital for the shoppable service?
	Does the tool provide estimates for as many of the 70 CMS-specified shoppable services that are provided by the hospital?
	Does the tool provide additional hospital-selected shoppable services as is necessary for a combined total of at least 300 shoppable services?
Accessibility	
	Is the tool prominently displayed on your hospital’s website?
	Is the tool accessible to the public without charge?
	Is the tool accessible without having to register or establish a user account or password?

<sup>i</sup> 84 FR 65524

<sup>ii</sup> Refer to 45 CFR §180.20 for the definition of hospital.

<sup>iii</sup> Refer to 45 CFR §180.30.

<sup>iv</sup> Refer to 45 CFR §180.50 for the full list of requirements specified in the section.

<sup>v</sup> Please note there may not be an associated data element for every item or service provided by the hospital. For example, the hospital may not have established a cash price for inpatient gauze pads and gauze pads may not have an associated billing code.

<sup>vi</sup> Refer to 45 CFR §180.60 for the full list of requirements specified in the section.

<sup>vii</sup> This list can be found at 84 FR 65571-65572.

<sup>viii</sup> Refer to 45 CFR §180.60(a)(2) for price estimator tools.