# **Pricing Transparency**

Machine-Readable File

The Centers for Medicare & Medicaid Services (CMS) issued two rules effective January 1, 2021 that take historic steps to increase price transparency to empower patients and increase competition among all hospitals, group health plans and health insurance issuers in the individual and group markets. One of the rules is the Calendar Year (CY) 2020 Outpatient Prospective Payment System (OPPS) & Ambulatory Surgical Center (ASC) Price Transparency Requirements for Hospitals to make a machine-readable file containing a list of all standard charges for all items and services public.<sup>1</sup>

### **OUR APPROACH**

FTI creates and offers to maintain the standard charges in a machinereadable file using Tableau.

- Charge Description File (CDM)
- Minimum/Maximum Negotiated
  Charges (Derived)
- Discounted Cash Price
- Six to Twelve months of payor 835's

## The Requirement



## Per 45 CFR-PART 180, a hospital must make two items public<sup>1</sup>

- Report of standard charges for an individual item or service (e.g., listed in the CDM) or package service (e.g., IP DRGs or OP surgical procedures in a machine-readable format)
- Report of standard charges for 300 shoppable services\*



## Standard Changes Include the Following Elements<sup>1</sup>

- Gross charges
- Discounted cash price
- Payer-specific negotiated charge: The charge that a hospital has negotiated with a third-party payer for an item or service (Each payer's negotiation charge must be clearly associated with the name of the third-party payer's name and plan)
- De-identified minimum and maximum negotiated charges
- New Procedure/Service Pricing
- Supply Charge Determination
- Drug Charge Determination
- Time-based Charging
- Bundled Charging





Pricing Transparency FTI Consulting, Inc. 02

## The standard charge report can be constructed from four data sets listed below:2,3

ALL SERVICES'	PRIMARY CODES (DRG OR HCPCS)	DESCRIPTIONS	I GROSS CHARGE	II DISCOUNTED CASH PRICE	III PAYER1 PLAN1	III PAYER1 PLAN 2	III PAYER2 PLAN 1	III PAYER2 PLAN 2	VI DE-IDENTIFIED MINIMUM NEGOTIATED CHARGE	V DE-IDENTIFIED MAXIMUM NEGOTIATED CHARGE
Package Services	216	Cardiac valve and other major cardiothoracic procedures with cardiac cath with major cc	Will need to develop based on data analysis							
	460	Spinal fusion except cervical w/o major cc								
	19120	Removal of 1 or more breast growth, open procedure								
	29826	Shaving of shoulder bone using an endoscope								
Individual Services	97110	Therapeutic exercises	\$ 120.00							
	73721	MRI scan of leg joint	\$ 1,678.00							
	72148	MRI scan of lower spinal canal	\$ 1,678.00							
	85027	Complete cbc automated	\$ 80.00							
	85025	Complete cbc w/auto diff wbc	\$ 100.00							



- Code
- Description
- Charge
- Identifiable Fields\*\*





- Discount %
- Identifiable Fields\*\*



- Payer Code
- Payer Description
- Plan Code
- Plan Description
- Rate
- Identifiable Fields\*\*

 $[https://www.cms.gov/outreach-and-educationoutreachffsprovpartprogprovider-partnership-email-archive/2020-12-18-mlnc-se.] \ (Jan 10, 2021) \$ 

<sup>3</sup>Centers for Medicare & Medicaid Services [Dec 18, 2020] [https://www.cms.gov/files/document/hospital-price-transparency-frequently-asked-questions.pdf.] (Jan 10, 2021)

#### **DAVID BENN**

Senior Managing Director +1.813.760.5973 david.benn@fticonsulting.com

The views expressed herein are those of the author(s) and not necessarily the views of FTI Consulting, Inc., its management, its subsidiaries, its affiliates, or its other professionals. FTI Consulting, Inc., including its subsidiaries and affiliates, is a consulting firm and is not a certified public accounting firm or a law firm.

FTI Consulting is an independent global business advisory firm dedicated to helping organizations manage change, mitigate risk and resolve disputes: financial, legal, operational, political & regulatory, reputational and transactional. FTI Consulting professionals, located in all major business centers throughout the world, work closely with clients to anticipate, illuminate and overcome complex business challenges and opportunities. ©2022 FTI Consulting, Inc. All rights reserved. www.fticonsulting.com



<sup>\*</sup>Shoppable Services are defined as a service that can be scheduled by a consumer in advance

<sup>\*\*</sup>Identifiable fields include any elements required to identify unique fee schedules and join data sources together (e.g., ServiceArea, Specialty, Department)

<sup>\*\*\*</sup>Experience level package pricing

<sup>&</sup>lt;sup>1</sup>Health and Human Solutions [Nov 7, 2019] [https://www.hhs.gov/sites/default/files/cms-1717-f2.pdf.] (Jan 10, 2021).

<sup>&</sup>lt;sup>2</sup>Centers for Medicare & Medicaid Services [Dec 18, 2020]