CMS 2019 Final Rule Hospital Price Transparency

	Minimum Requirement			Options that Exceed Requirement			
What to Publish:	Chargemaster Description and Price	Average DRG Charges (number, description and average charge)	Drug and Biological Prices (name and average charge)	Chargemaster Description, Price, HCPCS code with or without comparative market data for all or top services	Average DRG Charges for Medicare Patients and Non-Medicare (or top non-Medicare Payers) published separately, with or without comparative market data for all or top services. Consider similar posting of average charges for top outpatient surgical and ED levels. Publish with DRG number or for outpatient primary procedure code plus descriptions and average charge.	Consumer friendly Average or Average Range of Payments for Medicare and Non-Medicare (or top non-Medicare Payers) and split between in-network vs out-of-network. Consider for all DRG's and for top outpatient surgical and ED levels.	Drug and Biological Prices (name, average charge, NDC number)
To do:	Annually re-align CDM prices with cost, market, fee schedule and other benchmarks & perform gross and net revenue modeling	Publish average charge supplied by CMS and disclose as Medicare or calculate recent 6 to 12 mos average for All Payers	Assess drug pricing methodology and comparative data and implement adjustments or new "best practice" methodology if needed	Annually re-align CDM prices with cost, market, fee schedule and other benchmarks & perform gross and net revenue modeling	Calculate average charge or average range calculated from recent 6 to 12 mos average for All Payers	Calculate average Payments from most recent 6 to 12 mos Paid Claims and Payment Data. Suggested for top payers and in-network and out-of-network shown separately to optimize consumer usefulness	Assess drug pricing methodology and comparative data and implement adjustments or new "best practice" methodology if needed

Publish with search function?

	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Write Program	✓		✓		✓		✓		✓		✓		✓	
XML or CSV (not PDF)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Update and maintain no less than annually	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Other Considerations:

- While minimum requirements must be met you can organize the web pages to include your policy, present at top of pages the more consumer friendly options such as search capability or top inpatient and outpatient procedures with access to complete CDM or Drug prices found via link to another page or download link.
- Creation of a policy page or registration page may meet requirement provided user is automatically taken to the chargemaster and other price lists.

Learn more at panaceainc.com or call 1-866-926-5933.