# Hospital Price Transparency Posting Evaluation Report Fall 2025

**November 2025**

## Key Findings

The Department of Health Care Policy and Financing (HCPF) developed a Good, Fair, Poor rating system to measure the quality of adherence to federal and state hospital price transparency rules. In August 2025, HCPF reviewed 101 of Colorado's general, critical access, children's, long-term acute care, rehabilitation, and psychiatric hospitals' downloadable price transparency files and shoppable service estimator tools or displays.[1] Each was evaluated using a scorecard and marked "Y" if the criteria was met or "N" if the criteria was not met. These prices posted by hospitals are used to populate various tools, including the Hospital Price Transparency Tool developed by HCPF, with significant contributions from the Center for Improving Value in Healthcare (CIVHC), which plays a key role in standardizing all hospital machine-readable files. This tool makes it easier for consumers, policymakers, and purchasing organizations to compare hospital prices, identify outlier opportunities to be addressed, and advance shared affordability goals that save people money on health care.

- **Overall hospital quality declined from February to August 2025**, with Good ratings falling from 45.6% to 39.6%, and Poor ratings rising from 18.4% to 40.6%.

- **Failure to incorporate ongoing updates to the federal hospital price transparency rule contributed to the decline**, with performance in Negotiated Rates and Drug Measurement downloadable file categories dropping by 12.9% and 7.1%, respectively. Both declines stem from federal rule updates in the previous year.

- **Most Colorado hospitals update their federally required machine-readable files once per calendar year**, typically in the fourth or first quarter, which may explain recent declines, as many have not yet incorporated the latest rule changes.

- **Poor ratings increased across key hospital types**, affecting 35 of 87 children's, general, and critical access hospitals, including 19 independent hospitals, an increase of 25 hospitals from the previous February 2025 evaluation.

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[1] The evaluation reflects what was currently available at the time of the review and HCPF is aware that hospitals may have updated their transparency postings after review but during the review period.

- **Long-term acute care, rehabilitation, and psychiatric hospitals collectively improved.**

Although HCPF's evaluation is limited to Colorado hospitals, other evaluations show Colorado hospitals are better than national benchmarks when comparing the quality of federal price transparency postings. Specifically, Turquoise Health's January 2024 study comparing all states indicated that 65.4% of Colorado hospitals had the highest rating of five, which ranks 8th highest compared to all other states.[2] Additionally, the Seventh Semi-Annual Hospital Price Transparency Report by Patient Rights Advocate found that only 21.1% of hospitals nationally are compliant with federal price transparency while 60% or 21 out of 35 Colorado hospitals are compliant.[3] Notably, both studies were conducted before recent federal rule updates, and the decline in Colorado hospitals scores reflect incomplete compliance with the revised standards.

Given these changes in federal guidance and the timing of responses by Colorado hospitals, we may see a return to the higher quality metrics as part of the Spring 2026 evaluation report. HCPF will continue monitoring to confirm this or identify a continuation of lower quality ratings while hospitals catch up with changes to CMS guidance.

Further opportunities exist to strengthen the connection between provider or carrier price transparency and patient decision making, ultimately helping individuals save on healthcare costs. These opportunities involve establishing enforceable contractable pricing, and incentivizing cost conscious decision making among patients enrolled in carrier plans. The Department looks forward to continued work in this area.

## Introduction

In 2023, hospital care was the largest component of U.S. health care spending, totaling $1.5 trillion and accounting for about 31% of overall costs.[4] The health care sector's share of the economy is projected to rise from 17.6% of GDP in 2023 to 20.3% by 2033. During the same period, per person health spending is expected to increase

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[2] Moving into 2024: State of Price Transparency. (2024, January 4). Turquoise Health Blog. https://blog.turquoise.health/moving-into-2024-state-of-price-transparency/. State percentages calculated from downloaded data for comparison.
[3] Seventh Semi-Annual Hospital Price Transparency Report. (2024, November). PatientRightsAdvocate.org. https://www.patientrightsadvocate.org/seventh-semi-annual-hospital-price-transparency-report-november-2024
[4] Centers for Medicare & Medicaid Services, Office of the Actuary, National Health Statistics Group. (2023). THE NATION'S HEALTH DOLLAR ($4.9 TRILLION), CALENDAR YEAR 2023: WHERE IT CAME FROM. https://www.cms.gov/files/document/nations-health-dollar-where-it-came-where-it-went.pdf

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from $14,570 to $24,200.[5] Hospital price transparency contributes to a more open and competitive market while providing greater awareness across communities as to the comparative prices their local hospitals charge. Together, these emerging price transparency insights help drive down hospital prices paid by employers and consumer purchasers and ultimately the prices paid for health care coverage. However, for price transparency policy to be effective, hospitals must be compliant with federal and state hospital price transparency rules.[6]

The following performance assessment has a quality scale with three different ratings: Good, Fair, and Poor. This scale measures the conformity of the hospital's price transparency postings, *not* if hospitals are compliant. Hospital compliance with the federal price transparency rule is the purview of the federal Centers for Medicare and Medicaid Services (CMS). This report is to help hospitals identify if they may not be compliant with state or federal rules, allows for hospitals to complete an internal review to examine whether any necessary changes are needed to ensure they are in compliance with federal rules and state legislation around price postings, and enables hospitals to self-correct before a corrective action plan is issued. Ultimately, this price transparency report better enables all hospitals to be part of the health care affordability solution. These combined efforts are for the betterment of all Coloradans, the state budget, employers, and taxpayers. HCPF evaluates hospitals' price transparency postings and produces this report twice per year to achieve the above shared goals as well as the Polis-Primavera Administration's overarching objective of saving people money on health care.

HCPF regularly reaches out to hospitals rated as Poor to offer technical assistance to assist them with federal requirement compliance and the downstreaming impacts on Colorado legislative compliance specific to price postings.

For the downloadable file, HCPF's primary focus is to evaluate hospitals' files compared to current requirements, including the most recent May 22, 2025 CMS guidance in implementing Executive Order 14221.[7] Additionally, HCPF focused on the

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[5] *CMS*. National Health Expenditures (NHE) Projections 2024-33 Highlights. (n.d.). https://www.cms.gov/files/document/nhe-projections-infographic.pdf
[6] Hospital Price Transparency, 45 CFR Part 180 (2019). https://www.ecfr.gov/current/title-45/part-180; Medical Price Transparency, Senate Bill 23-252, 2023 Regular Session, (2023). https://leg.colorado.gov/bills/sb23-252
[7] Centers for Medicare & Medicaid Services. (2025). Updated Hospital Price Transparency Guidance Implementing the President's Executive Order "Making America Healthy Again by Empowering Patients with Clear, Accurate, and Actionable Healthcare Pricing Information." In Centers for Medicare & Medicaid Services. https://www.cms.gov/files/document/updated-hpt-guidance-encoding-allowed-amounts.pdf

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availability of a shoppable services tool or display that allows consumers to obtain a service price when shopping for one of the 70 CMS-specified shoppable service codes.[8] Prices for third-party payers were not factored in the shoppable services criteria because the majority of Colorado hospitals utilize an estimator tool, which can require specific insurance information to receive a price or quote.

The complete scorecard criteria and rating details are in **Appendix A: Methodology**. The methodology has been updated to reflect the changes made to the federal hospital price transparency rule, which requires hospitals to post actual dollar amounts for estimated rates and discontinue using 999999999 (nine 9s), among other changes.

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[8] 10 Steps to Making Public Standard Charges for Shoppable Services. (n.d.).
https://www.cms.gov/files/document/steps-making-public-standard-charges-shoppable-services.pdf

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# Hospital Scorecard

## Table 1: Scorecard by Hospital August 2025

| Marketed Name | Current System | Hospital type | 2025 August Overall Quality Rating | Downloadable File Quality Rating | Shoppable Service Quality Rating | SB23-252 Medicare Rates Quality Rating | Machine Readable | Posted or Updated Date Within 365 | Code and Code Type | Description | Setting | Drug Measurement | Gross Charges | Discounted Cash | De-Identified Minimum & Maximum | Negotiated Rates | Plans | Shoppable Services Type | Cash Price |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| AdventHealth Avista | AdventHealth | General | Poor | Poor | Good | Good | Y | Y | Y | Y | Y | N | Y | Y | Y | Y | Y | Display | Y |
| AdventHealth Castle Rock | AdventHealth | General | Poor | Poor | Good | Good | Y | Y | Y | Y | Y | N | Y | Y | Y | Y | Y | Display | Y |
| AdventHealth Littleton | AdventHealth | General | Poor | Poor | Good | Good | Y | Y | Y | Y | Y | N | Y | Y | Y | Y | Y | Display | Y |
| AdventHealth Parker | AdventHealth | General | Poor | Poor | Good | Good | Y | Y | Y | Y | Y | N | Y | Y | Y | Y | Y | Display | Y |
| AdventHealth Porter | AdventHealth | General | Poor | Poor | Good | Good | Y | Y | Y | Y | Y | N | Y | Y | Y | Y | Y | Display | Y |
| Animas Surgical Hospital | Independent | General | Poor | Poor | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | N | N | Display | Y |
| Arkansas Valley Regional Medical Center | Independent | Critical Access | Fair | Good | Good | Fair | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Aspen Valley Hospital | Independent | Critical Access | Poor | Poor | Poor | Poor | Y | Y | Y | Y | N | N | Y | Y | Y | Y | Y | Display | N |
| Banner Fort Collins Medical Center | Banner Health | General | Fair | Fair | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Boulder Community Health | Independent | General | Poor | Fair | Good | Poor | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| Broomfield Hospital | UCHealth | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Cedar Springs Hospital | Independent | Psychiatric | Poor | Fair | Good | Poor | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | N | Display | Y |
| Centennial Peaks Hospital | Independent | Psychiatric | Fair | Good | Good | Poor | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Children's Hospital Colorado | Childrens | Children | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| Children's Hospital Colorado Springs | Childrens | Children | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| Community Hospital | Independent | General | Poor | Poor | Good | Poor | N | Y | Y | N | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| Craig Hospital | Independent | Long Term Acute Care | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Delta Health | Independent | General | Poor | Poor | Good | Poor | Y | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| Denver Health Medical Center | Independent | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| East Morgan County Hospital | Banner Health | Critical Access | Fair | Fair | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Encompass Health Rehabilitation Hospital of Colorado Springs | HealthSouth | Rehabilitation | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Encompass Health Rehabilitation Hospital of Littleton | HealthSouth | Rehabilitation | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Estes Park Health | Independent | Critical Access | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Family Health West | Independent | Critical Access | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Good Samaritan Medical Center | Intermountain Health | General | Poor | Poor | Good | Poor | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |

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| Marketed Name | Current System | Hospital type | 2025 August Overall Quality Rating | Downloadable File Quality Rating | Shoppable Service Quality Rating | SB23-252 Medicare Rates Quality Rating | Machine Readable | Posted or Updated Date Within 365 | Code and Code Type | Description | Setting | Drug Measurement | Gross Charges | Discounted Cash | De-Identified Minimum & Maximum | Negotiated Rates | Plans | Shoppable Services Type | Cash Price |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Grand River Hospital District | Independent | Critical Access | Fair | Fair | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Grandview Hospital | UCHealth | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Gunnison Valley Health | Independent | Critical Access | Fair | Fair | Good | Fair | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Haxtun Hospital District | Independent | Critical Access | Poor | Poor | Good | Poor | N | Y | Y | Y | Y | Y | Y | Y | N | N | N | Display | Y |
| HCA HealthONE Aurora | HCA HealthONE | General | Poor | Poor | Good | Fair | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| HCA HealthONE Mountain Ridge | HCA HealthONE | General | Poor | Poor | Good | Fair | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| HCA HealthONE Presbyterian St. Luke's | HCA HealthONE | General | Poor | Poor | Good | Fair | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| HCA HealthONE Rose | HCA HealthONE | General | Poor | Poor | Good | Fair | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| HCA HealthONE Sky Ridge | HCA HealthONE | General | Poor | Poor | Good | Fair | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| HCA HealthONE Spalding Rehabilitation | HCA HealthONE | Rehabilitation | Poor | Poor | Good | Fair | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| HCA HealthONE Swedish | HCA HealthONE | General | Poor | Poor | Good | Fair | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| Heart of the Rockies Regional Medical Center | Independent | Critical Access | Fair | Fair | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Highlands Behavioral Health System | Independent | Psychiatric | Fair | Good | Good | Poor | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Keefe Memorial Health Service District | Independent | Critical Access | Fair | Good | Good | Poor | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| Kindred Hospital - Aurora | Kindred | Long Term Acute Care | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Kindred Hospital - Denver & Denver South | Kindred | Long Term Acute Care | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Kit Carson County Health Service District | Independent | Critical Access | Poor | Poor | Good | Good | Y | Y | Y | Y | Y | N | Y | Y | Y | Y | Y | Display | Y |
| Lincoln Community Hospital | Independent | Critical Access | Poor | Poor | Good | Poor | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Y | Tool | Y |
| Longmont United Hospitals | CommonSpirit | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| Longs Peak Hospital | UCHealth | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Lutheran Medical Center | Intermountain Health | General | Poor | Poor | Good | Poor | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| McKee Medical Center | Banner Health | General | Fair | Fair | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Medical Center of the Rockies | UCHealth | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Melissa Memorial Hospital | Independent | Critical Access | Fair | Fair | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Memorial Hospital Central | UCHealth | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Memorial Regional Health | Independent | Critical Access | Poor | Poor | Good | Poor | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| Mercy Hospital | CommonSpirit | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| Middle Park Health - Granby | Independent | Critical Access | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |

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| Marketed Name | Current System | Hospital type | 2025 August Overall Quality Rating | Downloadable File Quality Rating | Shoppable Service Quality Rating | SB23-252 Medicare Rates Quality Rating | Machine Readable | Posted or Updated Date Within 365 | Code and Code Type | Description | Setting | Drug Measurement | Gross Charges | Discounted Cash | De-Identified Minimum & Maximum | Negotiated Rates | Plans | Shoppable Services Type | Cash Price |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Middle Park Health - Kremmling | Independent | Critical Access | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Montrose Memorial Hospital | Independent | General | Fair | Fair | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Mt. San Rafael Hospital | Independent | Critical Access | Poor | Poor | Good | Poor | Y | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| National Jewish Health | Independent | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| North Colorado Medical Center | Banner Health | General | Fair | Fair | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Northern Colorado Long Term Acute Hospital | Independent | Long Term Acute Care | Poor | Poor | N/A | Good | N | Y | Y | Y | Y | Y | Y | Y | N | Y | Y | IP Only | N/A |
| Northern Colorado Rehabilitation Hospital | Independent | Rehabilitation | Poor | Poor | Poor | Good | N | Y | Y | Y | Y | Y | Y | Y | N | Y | Y | Display | N |
| OrthoColorado Hospital | CommonSpirit | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | |
| Pagosa Springs Medical Center | Independent | Critical Access | Poor | Poor | Good | Good | Y | N | Y | Y | Y | N | Y | Y | Y | Y | Y | Tool | Y |
| PAM Specialty Hospital of Denver | PAM Health | Long Term Acute Care | Poor | Fair | N/A | Poor | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | IP Only | N/A |
| Parkview Medical Center | UCHealth | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Peak View Behavioral Health | Independent | Psychiatric | Poor | Fair | Good | Poor | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | N | Display | Y |
| Penrose Hospital | CommonSpirit | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | |
| Pikes Peak Regional Hospital | UCHealth | Critical Access | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Pioneers Medical Center | Independent | Critical Access | Poor | Poor | Good | Good | Y | N | Y | Y | Y | N | Y | Y | Y | Y | N | Tool | Y |
| Platte Valley Medical Center | Intermountain Health | General | Poor | Poor | Good | Poor | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| Poudre Valley Hospital | UCHealth | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Prowers Medical Center | Independent | Critical Access | Fair | Fair | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | N | Display | Y |
| Rangely District Hospital | Independent | Critical Access | Fair | Fair | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Rio Grande Hospital | Independent | Critical Access | Poor | Poor | Good | Good | Y | N | Y | Y | Y | N | Y | Y | Y | Y | Y | Tool | Y |
| San Luis Valley Health Conejos County Hospital | San Luis Valley | Critical Access | Fair | Fair | Good | Fair | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| San Luis Valley Health Regional Medical Center | San Luis Valley | General | Fair | Fair | Good | Fair | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Sedgwick County Health Center | Independent | Critical Access | Poor | Fair | Good | Poor | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | N | Display | Y |
| Southeast Colorado Hospital District | Independent | Critical Access | Poor | Poor | Good | Good | Y | Y | Y | Y | Y | N | Y | Y | Y | Y | Y | Display | Y |

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Southwest Health System, Inc. | Independent | Critical Access | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Spanish Peaks Regional Health Center | Independent | Critical Access | Fair | Fair | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| St. Anthony Hospital | CommonSpirit | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| St. Anthony North Hospital | CommonSpirit | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| St. Anthony Summit Hospital | CommonSpirit | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| St. Elizabeth Hospital | CommonSpirit | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| St. Francis Hospital | CommonSpirit | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| St. Francis Hospital - Interquest | CommonSpirit | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| St. Joseph Hospital | Intermountain Health | General | Poor | Poor | Good | Poor | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| St. Mary-Corwin Hospital | CommonSpirit | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| St. Mary's Hospital & Medical Center, Inc. | Intermountain Health | General | Poor | Poor | Good | Poor | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Tool | Y |
| St. Thomas More Hospital | CommonSpirit | Critical Access | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Tool | Y |
| St. Vincent General Hospital District | Independent | Critical Access | Poor | Poor | Good | Poor | Y | Y | Y | Y | Y | N | Y | Y | Y | Y | Y | Display | Y |
| Sterling Regional MedCenter | Banner Health | General | Fair | Fair | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| UCHealth Greeley | UCHealth | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| UCHealth Highlands Ranch | UCHealth | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| University of Colorado Hospital | UCHealth | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Vail Health Hospital | Independent | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Valley View Hospital | Independent | General | Poor | Poor | Good | Fair | N | Y | Y | Y | Y | Y | Y | Y | Y | N | Y | Display | Y |
| Vibra Hospital | Independent | Long Term Acute Care | Good | Good | N/A | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | IP Only | N/A |
| Weisbrod Memorial County Hospital | Independent | Critical Access | Fair | Fair | Good | Good | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Wray Community District Hospital | Independent | Critical Access | Poor | Poor | Good | Poor | Y | N | Y | Y | Y | Y | Y | Y | N | Y | Y | Display | Y |
| Yampa Valley Medical Center | UCHealth | General | Good | Good | Good | Good | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Display | Y |
| Yuma District Hospital | Independent | Critical Access | Poor | Poor | Good | Good | Y | N | Y | Y | Y | N | Y | Y | Y | Y | Y | Display | Y |

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# Chronological Hospital Scorecard Ratings

## Table 2: November 2022-August 2025 Overall Quality Rating by Hospital

| Marketed Name | Current System | Hospital type | 2025 August Overall Quality Rating | 2025 February Overall Quality Rating | 2024 May Overall Quality Rating | 2023 September Overall Quality Rating | 2022 November Overall Quality Rating |
|---|---|---|---|---|---|---|---|
| AdventHealth Avista | AdventHealth | General | Poor | Fair | Fair | Good | Good |
| AdventHealth Castle Rock | AdventHealth | General | Poor | Fair | Fair | Good | Good |
| AdventHealth Littleton | AdventHealth | General | Poor | Fair | Fair | Good | Good |
| AdventHealth Parker | AdventHealth | General | Poor | Fair | Fair | Good | Good |
| AdventHealth Porter | AdventHealth | General | Poor | Fair | Fair | Good | Good |
| Animas Surgical Hospital | Independent | General | Poor | Good | Good | Poor | Fair |
| Arkansas Valley Regional Medical Center | Independent | Critical Access | Fair | Good | Good | Good | Good |
| Aspen Valley Hospital | Independent | Critical Access | Poor | Fair | Poor | Poor | Poor |
| Banner Fort Collins Medical Center | Banner Health | General | Fair | Good | Good | Poor | Fair |
| Boulder Community Health | Independent | General | Poor | Fair | Poor | Poor | Fair |
| Broomfield Hospital | UCHealth | General | Good | Good | Good | Good | Fair |
| Cedar Springs Hospital | Independent | Psychiatric | Poor | Poor | Fair | Good | |
| Centennial Peaks Hospital | Independent | Psychiatric | Fair | Poor | Fair | Good | |
| Children's Hospital Colorado | Childrens | Children | Good | Fair | Fair | Good | Poor |
| Children's Hospital Colorado Springs | Childrens | Children | Good | Fair | Fair | Good | Poor |
| Community Hospital | Independent | General | Poor | Poor | Fair | Good | Good |
| Craig Hospital | Independent | Long Term Acute Care | Good | Good | Poor | Good | |
| Delta Health | Independent | General | Poor | Poor | Poor | Poor | Poor |
| Denver Health Medical Center | Independent | General | Good | Good | Good | Poor | Good |
| East Morgan County Hospital | Banner Health | Critical Access | Fair | Good | Good | Good | Fair |
| Encompass Health Rehabilitation Hospital of Colorado Springs | HealthSouth | Rehabilitation | Good | Good | Good | Good | |
| Encompass Health Rehabilitation Hospital of Littleton | HealthSouth | Rehabilitation | Good | Good | Good | Good | |
| Estes Park Health | Independent | Critical Access | Good | Good | Good | Good | Poor |
| Family Health West | Independent | Critical Access | Good | Fair | Fair | Good | Poor |
| Good Samaritan Medical Center | Intermountain Health | General | Poor | Fair | Fair | Good | Fair |
| Grand River Hospital District | Independent | Critical Access | Fair | Good | Good | Good | Poor |
| Grandview Hospital | UCHealth | General | Good | Good | Good | Good | Fair |
| Gunnison Valley Health | Independent | Critical Access | Fair | Good | Good | Good | Fair |
| Haxtun Hospital District | Independent | Critical Access | Poor | Poor | Poor | Poor | Poor |
| HCA HealthONE Aurora | HCA HealthONE | General | Poor | Fair | Fair | Poor | Poor |
| HCA HealthONE Mountain Ridge | HCA HealthONE | General | Poor | Fair | Fair | Poor | Poor |
| HCA HealthONE Presbyterian St. Luke's | HCA HealthONE | General | Poor | Fair | Fair | Poor | Poor |
| HCA HealthONE Rose | HCA HealthONE | General | Poor | Fair | Fair | Poor | Poor |
| HCA HealthONE Sky Ridge | HCA HealthONE | General | Poor | Fair | Fair | Poor | Poor |
| HCA HealthONE Spalding Rehabilitation | HCA HealthONE | Rehabilitation | Poor | Fair | Fair | Poor | |
| HCA HealthONE Swedish | HCA HealthONE | General | Poor | Fair | Fair | Poor | Poor |
| Heart of the Rockies Regional Medical Center | Independent | Critical Access | Fair | Good | Good | Good | Good |
| Highlands Behavioral Health System | Independent | Psychiatric | Fair | Fair | Fair | Good | |
| Keefe Memorial Health Service District | Independent | Critical Access | Fair | Poor | Good | Poor | Poor |
| Kindred Hospital - Aurora | Kindred | Long Term Acute Care | Good | Poor | Fair | Poor | |
| Kindred Hospital - Denver & Denver South | Kindred | Long Term Acute Care | Good | Poor | Fair | Poor | |

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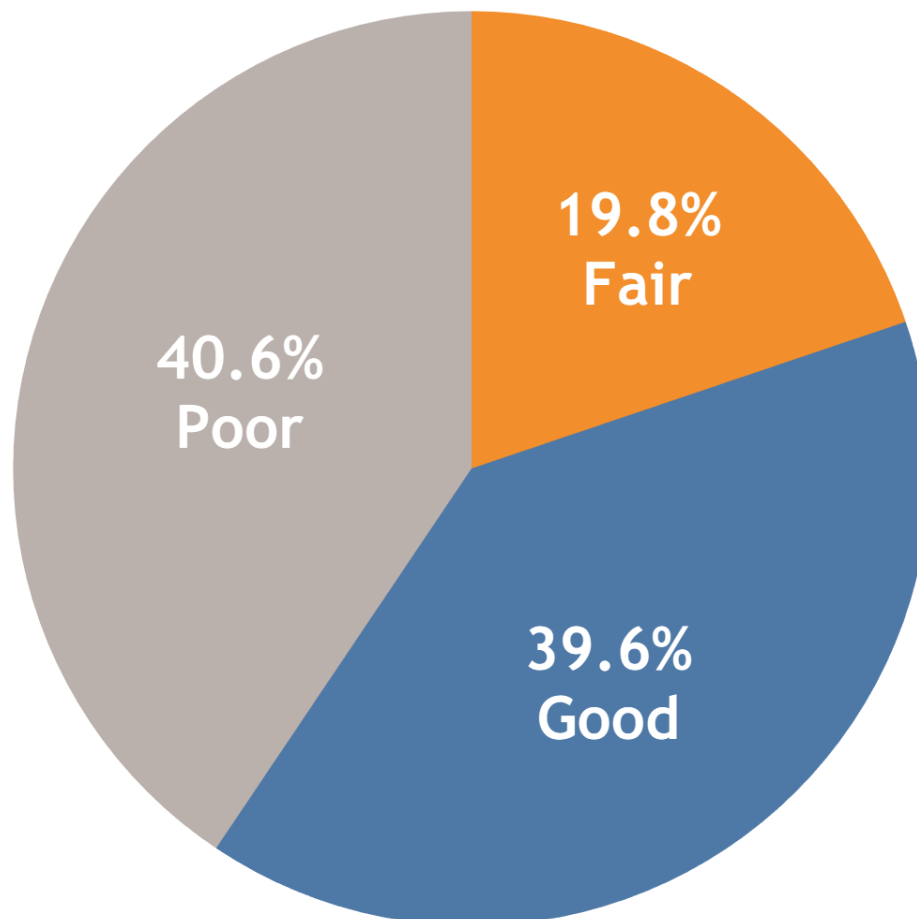Department of Health Care
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| Marketed Name | Current System | Hospital type | 2025 August Overall Quality Rating | 2025 February Overall Quality Rating | 2024 May Overall Quality Rating | 2023 September Overall Quality Rating | 2022 November Overall Quality Rating |
|---|---|---|---|---|---|---|---|
| Kit Carson County Health Service District | Independent | Critical Access | Poor | Fair | Fair | Good | Poor |
| Lincoln Community Hospital | Independent | Critical Access | Poor | Poor | Poor | Poor | Good |
| Longmont United Hospitals | CommonSpirit | General | Good | Good | Good | Good | Good |
| Longs Peak Hospital | UCHealth | General | Good | Good | Good | Good | Fair |
| Lutheran Medical Center | Intermountain Health | General | Poor | Fair | Fair | Good | Fair |
| McKee Medical Center | Banner Health | General | Fair | Good | Good | Good | Fair |
| Medical Center of the Rockies | UCHealth | General | Good | Good | Good | Good | Fair |
| Melissa Memorial Hospital | Independent | Critical Access | Fair | Good | Good | Fair | Fair |
| Memorial Hospital Central | UCHealth | General | Good | Good | Good | Good | Fair |
| Memorial Regional Health | Independent | Critical Access | Poor | Fair | Good | Fair | Fair |
| Mercy Hospital | CommonSpirit | General | Good | Good | Poor | Good | Good |
| Middle Park Health - Granby | Independent | Critical Access | Good | Good | | | |
| Middle Park Health - Kremmling | Independent | Critical Access | Good | Good | Good | Good | Poor |
| Montrose Memorial Hospital | Independent | General | Fair | Good | Good | Fair | Fair |
| Mt. San Rafael Hospital | Independent | Critical Access | Poor | Fair | Fair | Good | Good |
| National Jewish Health | Independent | General | Good | Poor | Fair | Poor | Good |
| North Colorado Medical Center | Banner Health | General | Fair | Good | Good | Good | Fair |
| Northern Colorado Long Term Acute Hospital | Independent | Long Term Acute Care | Poor | Poor | Poor | Poor | |
| Northern Colorado Rehabilitation Hospital | Independent | Rehabilitation | Poor | Poor | Poor | Poor | |
| OrthoColorado Hospital | CommonSpirit | General | Good | Good | Good | Good | Good |
| Pagosa Springs Medical Center | Independent | Critical Access | Poor | Good | Good | Good | Fair |
| PAM Specialty Hospital of Denver | PAM Health | Long Term Acute Care | Poor | Fair | Fair | Poor | |
| Parkview Medical Center | UCHealth | General | Good | Good | Good | Fair | Good |
| Peak View Behavioral Health | Independent | Psychiatric | Poor | Poor | Poor | Poor | |
| Penrose Hospital | CommonSpirit | General | Good | Fair | Good | Good | |
| Pikes Peak Regional Hospital | UCHealth | Critical Access | Good | Good | Good | Good | Fair |
| Pioneers Medical Center | Independent | Critical Access | Poor | Poor | Fair | Good | Poor |
| Platte Valley Medical Center | Intermountain Health | General | Poor | Fair | Fair | Good | Fair |
| Poudre Valley Hospital | UCHealth | General | Good | Good | Good | Good | Fair |
| Prowers Medical Center | Independent | Critical Access | Fair | Fair | Poor | Fair | Fair |
| Rangely District Hospital | Independent | Critical Access | Fair | Good | Good | Fair | Fair |
| Rio Grande Hospital | Independent | Critical Access | Poor | Good | Good | Good | Fair |
| San Luis Valley Health Conejos County Hospital | San Luis Valley | Critical Access | Fair | Fair | Fair | Poor | Fair |
| San Luis Valley Health Regional Medical Center | San Luis Valley | General | Fair | Fair | Fair | Poor | Fair |
| Sedgwick County Health Center | Independent | Critical Access | Poor | Poor | Poor | Fair | Poor |
| Southeast Colorado Hospital District | Independent | Critical Access | Poor | Good | Fair | Fair | Fair |
| Southwest Health System, Inc. | Independent | Critical Access | Good | Good | Fair | Good | Fair |

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| Marketed Name | Current System | Hospital type | 2025 August Overall Quality Rating | 2025 February Overall Quality Rating | 2024 May Overall Quality Rating | 2023 September Overall Quality Rating | 2022 November Overall Quality Rating |
|---|---|---|---|---|---|---|---|
| St. Anthony Hospital | CommonSpirit | General | Good | Fair | Good | Good | Good |
| St. Anthony North Hospital | CommonSpirit | General | Good | Fair | Good | Good | Good |
| St. Anthony Summit Hospital | CommonSpirit | General | Good | Good | Good | Good | Good |
| St. Elizabeth Hospital | CommonSpirit | General | Good | Good | Good | Good | |
| St. Francis Hospital | CommonSpirit | General | Good | Fair | Good | Good | Good |
| St. Francis Hospital - Interquest | CommonSpirit | General | Good | Poor | | | |
| St. Joseph Hospital | Intermountain Health | General | Poor | Fair | Fair | Good | Fair |
| St. Mary-Corwin Hospital | CommonSpirit | General | Good | Good | Good | Good | Good |
| St. Mary's Hospital & Medical Center, Inc. | Intermountain Health | General | Poor | Fair | Fair | Good | Fair |
| St. Thomas More Hospital | CommonSpirit | Critical Access | Good | Good | Good | Good | Good |
| St. Vincent General Hospital District | Independent | Critical Access | Poor | Fair | Fair | Poor | Poor |
| Sterling Regional MedCenter | Banner Health | General | Fair | Good | Good | Good | Fair |
| UCHealth Greeley | UCHealth | General | Good | Good | Good | Good | Fair |
| UCHealth Highlands Ranch | UCHealth | General | Good | Good | Good | Good | Fair |
| University of Colorado Hospital | UCHealth | General | Good | Good | Good | Good | Fair |
| Vail Health Hospital | Independent | General | Good | Fair | Good | Good | Poor |
| Valley View Hospital | Independent | General | Poor | Good | Good | Poor | Poor |
| Vibra Hospital | Independent | Long Term Acute Care | Good | Good | Poor | Poor | |
| Weisbrod Memorial County Hospital | Independent | Critical Access | Fair | Poor | Good | Fair | Fair |
| Wray Community District Hospital | Independent | Critical Access | Poor | Fair | Poor | Poor | Fair |
| Yampa Valley Medical Center | UCHealth | General | Good | Good | Good | Good | Fair |
| Yuma District Hospital | Independent | Critical Access | Poor | Good | Good | Good | Fair |

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## Evaluation

This Price Transparency Evaluation Report expands upon the previous reviews completed in February 2025, May 2024, September 2023, and November 2022.[9] This report reviews the same 101 short-term acute care and long-term Colorado hospitals with the exclusion of the recently closed psychiatric hospitals, Johnstown Heights Behavioral Health and West Springs Hospital. As seen in **Figure 1**, 39.6% of hospitals had an overall quality rating of Good, while 19.8% had a rating of Fair, and 40.6% had a rating of Poor.

*Figure 1: Overall Quality Rating All Hospitals*

## August 2025



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[9] Hospital Price Transparency | Colorado Department of Health Care Policy & Financing. (n.d.). Hcpf.colorado.gov. https://hcpf.colorado.gov/hospital-price-transparency

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Colorado hospitals' overall quality ratings declined from the February 2025 evaluation, following the implementation of updated federal hospital price transparency rules.

**Figure 2** shows how overall ratings have changed from November 2022 to August 2025. In February 2025, 45.6% of hospitals reviewed had an overall quality rating of Good and 18.4% had an overall quality rating of Poor. As of August 2025, new ratings show hospitals declined, with only 39.6% receiving a rating of Good and 40.6% of hospitals receiving a rating of Poor.

*Figure 2: Overall Quality Rating All Hospitals 2022 - 2025*
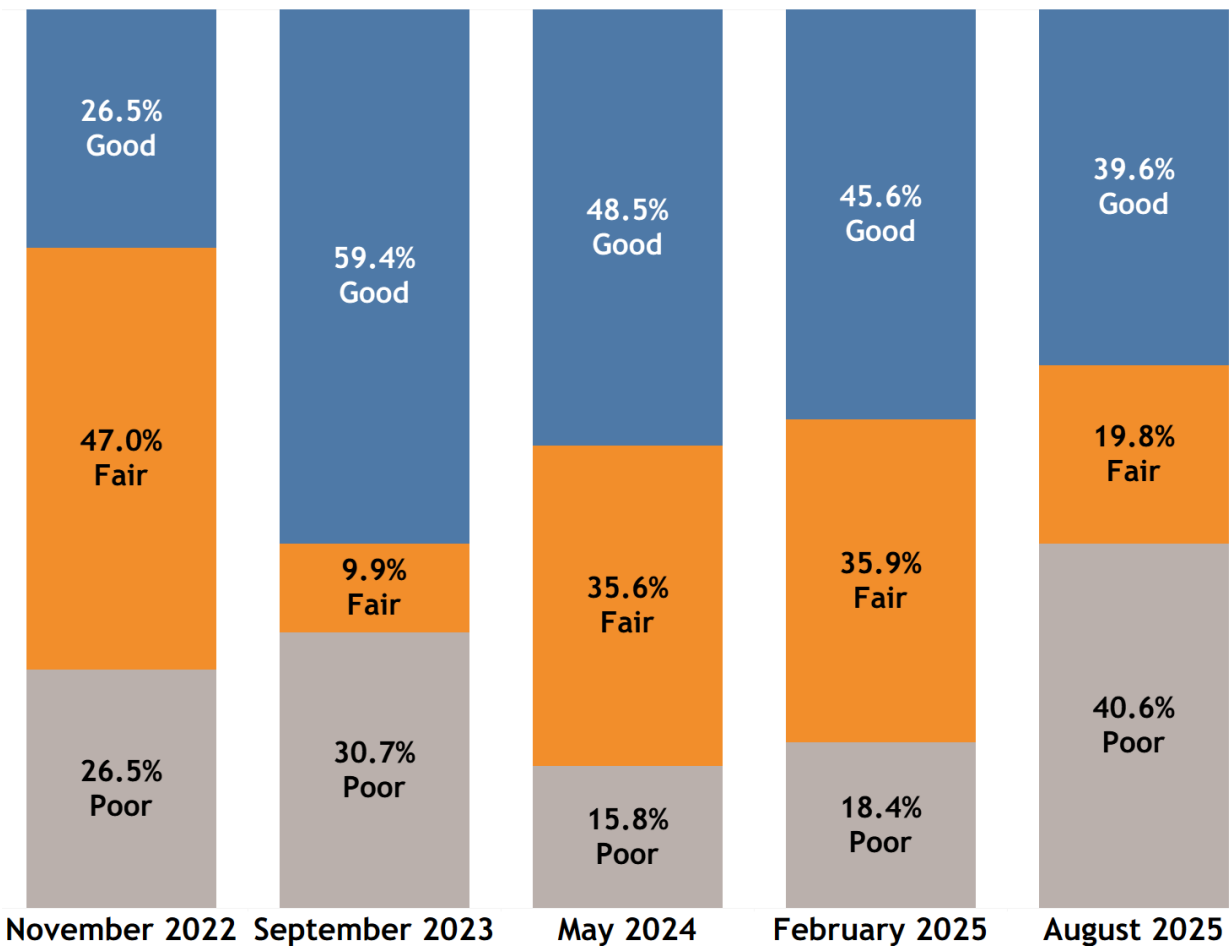


The decline in quality ratings visualized in **Figure 2** reflects the decrease in the machine-readable, negotiated rates, and drug measurement criteria met by hospitals, as seen in **Table 3**.

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*Table 3: Downloadable File Criteria Met by Category by All Hospitals Comparison*

| Downloadable File Category | August 2025 | February 2025 | Improved / (Declined) |
|---|---|---|---|
| Machine-Readable | 62.4% | 75.7% | (13.3%) |
| Posted or Updated Date Within 365 Days* | 93.1% | 95.1% | (2.0%) |
| Code and Code Type* | 100.0% | 98.1% | 1.9% |
| Description* | 99.0% | 99.0% | 0.0% |
| Setting | 99.0% | 96.1% | 2.9% |
| Drug Measurement* | 87.1% | 94.2% | (7.1%) |
| Gross Charges* | 100.0% | 97.1% | 2.9% |
| Discounted Cash* | 97.0% | 96.1% | 0.9% |
| De-Identified Minimum & Maximum* | 97.0% | 94.2% | 2.8% |
| Negotiated Rates* | 83.2% | 96.1% | (12.9%) |
| Plans | 94.1% | 92.2% | 1.9% |

*These categories must meet the defined criteria to receive a rating above Poor in both Overall Quality and Downloadable File Quality.

**Table 3** illustrates a decline in data quality in two critical categories: Negotiated Rates and Drug Measurement, which declined by 12.9% and 7.1%, respectively. These categories must meet defined criteria to receive a rating above Poor in both Overall Quality and Downloadable File Quality. The decline in the Negotiated Rates category is primarily due to hospitals failing to accompany negotiated rates, listed as a percentage of charges or referencing algorithmic calculations, with an actual dollar amount, as recently required by the May 22, 2025 CMS guidance. Federal clarification of finalized rules were effective immediately, and HCPF accessed hospital data in August 2025 over 60 days after the federal clarification was provided. Similarly, the decline in the Drug Measurement category is attributed to hospitals failing to list drug unit values and their corresponding measurement types in the designated columns.

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Additionally, the machine-readable category experienced a 13.3% decrease, caused by the same CMS guidance mandating the discontinuation of the use of nine 9s for estimated rates. Details on the downloadable file criteria met by hospital types for August 2025 can be found in **Appendix B: Additional Tables.**

Given that children's, general, and critical access hospitals account for 86.1% or 87 of the 101 hospitals reviewed in this evaluation, it is important to examine how these hospital types performed in terms of overall quality ratings. **Table 4** presents the total counts of the overall quality ratings for these hospitals, categorized by their respective systems.

*Table 4: Overall Quality Rating Hospital Count for Children's, General, and Critical Access Hospitals by System August 2025*

| Current System | Good | Fair | Poor |
|---|---|---|---|
| AdventHealth | 0 | 0 | 5 |
| Banner Health | 0 | 5 | 0 |
| Childrens | 2 | 0 | 0 |
| CommonSpirit | 12 | 0 | 0 |
| HCA HealthONE | 0 | 0 | 6 |
| Intermountain Health | 0 | 0 | 5 |
| San Luis Valley | 0 | 2 | 0 |
| UCHealth | 12 | 0 | 0 |
| Independent | 8 | 11 | 19 |
| Total | 34 | 18 | 35 |

**Table 4** illustrates that Children's, CommonSpirit, and UCHealth are the only systems in which all their hospitals received an overall quality rating of Good. In contrast, AdventHealth, HCA HealthONE, and Intermountain Health systems had an overall quality rating of Poor across all their hospitals. Of these 87 hospitals, 35 received overall quality ratings of Poor (including 19 independent hospitals), an increase of 25 hospitals from the previous February 2025 Evaluation. **Figure 3** further illustrates the

overall quality ratings by hospital system classification and type, highlighting the changes observed between February 2025 and August 2025.

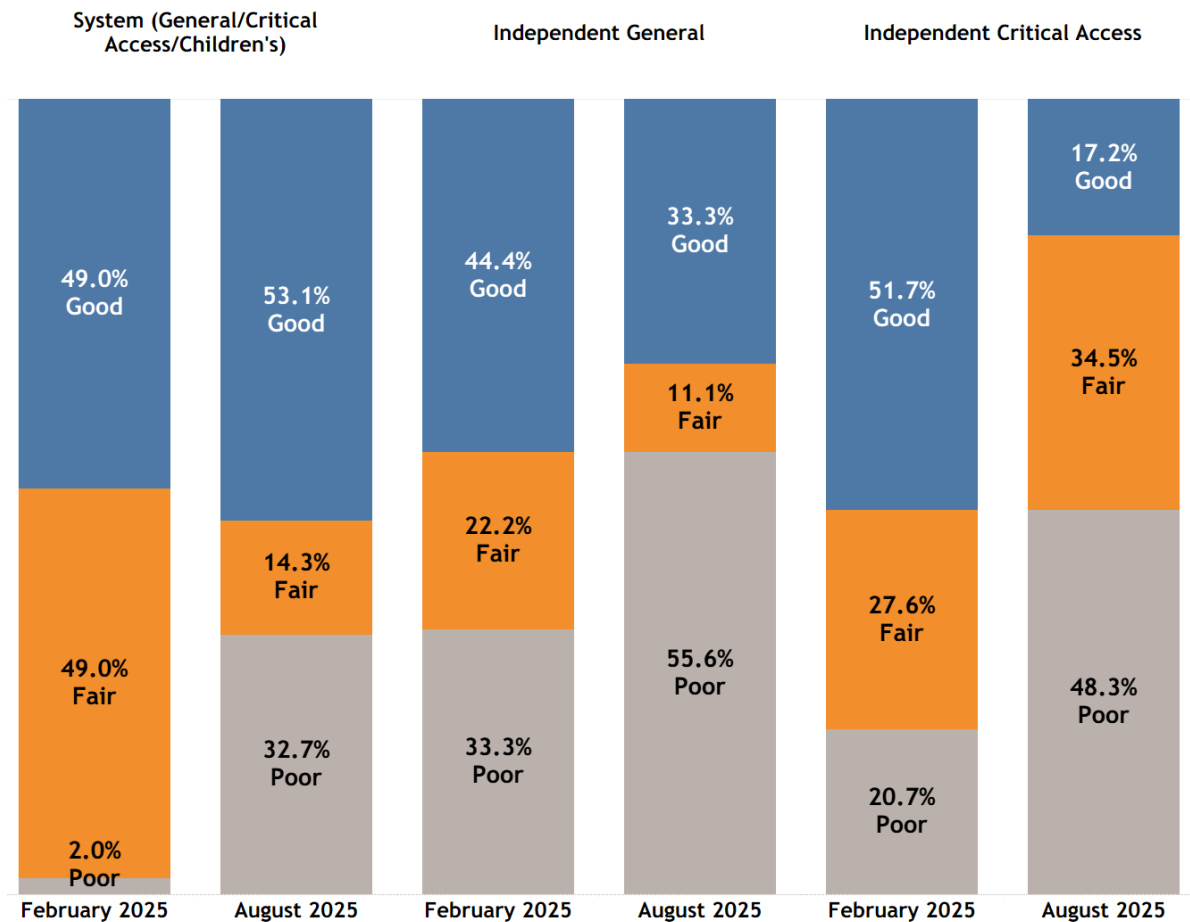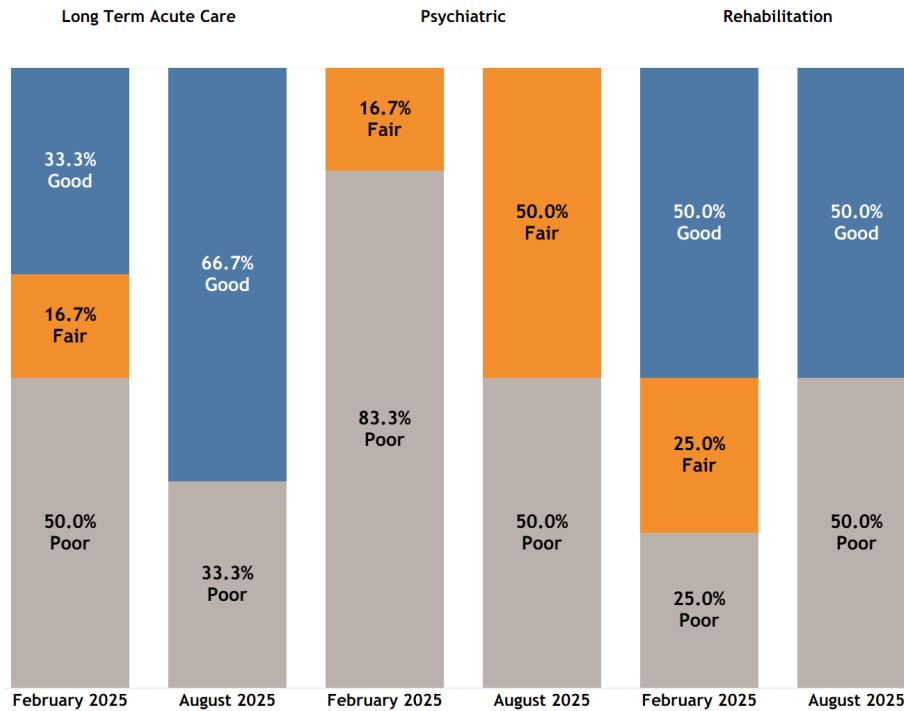*Figure 3: Overall Quality Rating by Hospital System Classification and Type*



**Figure 3** illustrates that all hospital classifications and types experienced an increase in the number of hospitals with an overall quality rating of Poor. Specifically, system general, critical access, and children's hospitals saw an increase of 15 hospitals rated Poor, independent general hospitals had 2 additional hospitals rated Poor, and independent critical access hospitals had an increase of 8 hospitals with an overall quality rating of Poor.

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*Figure 4: Overall Quality Rating for Long-Term Acute Care, Psychiatric and Rehabilitation Hospitals by Type*

In contrast, long-term acute care, rehabilitation, and psychiatric hospitals collectively showed an improvement in overall quality ratings, as illustrated in **Figure 4** above**.**

## Conclusion

The overall quality ratings of Colorado's hospitals in August 2025 reflect a substantial decline compared to the February 2025 evaluation. The percentage of hospitals rated Good dropped from 45.6% to 39.6%, while the proportion rated Poor increased significantly from 18.4% to 40.6%. This shift is largely attributed to challenges in meeting updated federal requirements, particularly within the Negotiated Rates and Drug Measurement categories. Importantly, the current federal hospital price transparency rule requires hospitals to update their machine-readable files only once per year, and the majority of Colorado hospitals tend to make these updates in the fourth or first quarter of the calendar year. This timing may have contributed to the observed decline, as many hospitals may be planning to incorporate the most recent CMS changes during their next scheduled update. Additionally, CMS recently proposed

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further revisions to the Hospital Price Transparency regulations under the CY 2026 Medicare Hospital OPPS and ASC Payment System proposed rule, with the public comment period concluding on September 15, 2025.[10] These proposed changes, effective January 1, 2026, would expand upon the May 22, 2025 CMS guidance and require hospitals to disclose the 10th, median, and 90th percentile allowed amounts, along with the count of allowed amounts. Given these potential new requirements, some hospitals may be deferring their updates in anticipation of having to implement more complex data reporting standards. Given these changes in federal guidance and the timing of responses by Colorado hospitals, we may see a return to the higher quality metrics as part of the next 6 month report or a continuation of lower quality ratings over a two year period. HCPF will continue monitoring to confirm this or identify a continuation of lower quality ratings while hospitals catch up with changes to CMS guidance.

Despite the overall decline in quality ratings, Colorado hospitals continue to outperform national averages in federal compliance, as supported by evaluations from Turquoise Health and Patient Rights Advocate. These findings reflect both the ongoing challenges and continued progress in advancing hospital price transparency.

**Consistent achievement of hospital price transparency is the foundation of any future progress towards making healthcare truly shoppable for consumers.** This will require transparent pricing from providers and insurance carriers, as well as enforceable contracting, and connecting price savings to savings for the patient. Future opportunities to save people money on healthcare involving price transparency should center on these three aspects, where the end result will be savings in patients' pockets as they have the resources to choose lower-priced care. This also incentivizes price competition in the healthcare industry and savings for carriers. HCPF is committed to further price transparency efforts and utilizes these efforts to lower patients' price for healthcare.

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[10] Centers for Medicare & Medicaid Services & Office of the Secretary. (2025). Medicare and Medicaid programs: Hospital outpatient prospective payment and ambulatory surgical center payment systems; quality reporting programs; overall hospital quality star ratings; and hospital price transparency [Proposed Rules]. Federal Register, 90(135), 33476–33477. https://www.govinfo.gov/content/pkg/FR-2025-07-17/pdf/2025-13360.pdf

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## Appendix A: Methodology

The rating methodology is composed of three elements: the downloadable file review, the shoppable service review, and the SB23-252 Medicare rates review.

### A. Downloadable File Review

Only hospitals know if they disclose all requirements in their price transparency postings. For example, it is difficult to determine what a blank cell means and how many specific third-party payers or individual payer plans a hospital should list. For this evaluation, HCPF reviewed all downloadable files in Excel format and converted them if necessary.

#### 1. Scorecard

"Y" meets and "N" does not meet the defined requirements:

- Machine Readable – Must be a required CMS template, in a CSV "tall", CSV "wide" or JSON format. Does not receive any errors or alerts when reviewing the machine-readable file in the current CMS Online Validator tool.[11]

- Posted or Updated Date – The file must have been posted or updated within 365 days from the day of the review. If two dates are present, such as an updated date and a data extract date, the most recent date will be reviewed.

- Code and Code Type– At least one specific code and its corresponding code type must be listed for multiple items or services.

- Description – A description must be listed for all items or services.

- Setting - A valid setting, "inpatient", "outpatient", or "both", must be listed for all items or services.

- Drug Measurement - If an item or service is a drug, a valid unit value and the corresponding type of measurement

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[11] CMS. (n.d.). Hospital price transparency - tools. https://cmsgov.github.io/hpt-tool/online-validator/

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must be provided in the appropriate drug unit and measurement columns.

- Gross Charges – A gross charge must be listed for multiple items or services.

- Discounted Cash - List a discounted cash price for multiple items or services or indicate discounted cash prices have not been established.

- De-Identified Minimum & Maximum – Both De-identified minimum and maximum dollar amounts must be present for any item or service that has a payer-specific negotiated rate posted.

- Negotiated Rates – Must have at least one commercial third-party payer listed with negotiated rates for multiple items or services, and nearly all third-party rates must specify a dollar amount.

- Plans – Every third-party payer must have either an individual plan or a category (such as "all PPO plans") listed.

2. **Quality Rating**
   - Good – "Y" in all categories.

   - Fair – "Y" in Posted or Updated Date, Code and Code Type, Description, Gross Charge, Discounted Cash, De-Identified Minimum & Maximum, Drug Measurement, and Negotiated Rates, but has at least one "N" in any other category.

   - Poor – Does not meet Good or Fair requirements.

B. **Shoppable Service Review**

HCPF was limited in testing hospitals' estimator tools because of the tools' designs. Several estimator tools required specific insurance information to generate a noncash price or quote. To check functionality, HCPF searched

for several of the CMS-required shoppable service codes for each hospital's cash price, including those that were listed with a discounted cash price on the hospital's downloadable file. If a hospital utilized two separate shoppable services display(s) and/or tool(s), HCPF reviewed the one located on the hospital's price transparency webpage and was labeled as "Shoppable Services. If a specialized hospital, such as, rehabilitation hospital, psychiatric hospital, or long term acute care hospital provides less than 300 items or services, determined by the total items or services listed in the downloadable file, the downloadable file was reviewed. In addition, if a specialized hospital does not provide outpatient services, determined by only having inpatient listed under the setting category in the downloadable file, the shoppable service quality rating will be marked as "N/A". If the downloadable file is missing the setting category and the hospital does not state 'they don't provide services that can be scheduled in advance', they will be reviewed as if they provide outpatient services.

1. **Scorecard**

   "Y" meets and "N" does not meet the defined requirement:

   - Cash Price – Obtained a self-pay cash price or quote for multiple codes from the 70 CMS-specified shoppable services codes. The cash price must be posted or updated within 365 days for displays or downloadable files and must be current for estimator tools.

2. **Quality Rating**
   - Good - "Y" for Cash Price.

   - Poor – "N" for Cash Price.

   - N/A - Only provides inpatient items or services.

C. **Colorado SB 23-252 Medicare Reimbursement Rates Review**

   Colorado SB 23 -252 added a requirement for hospitals to post Medicare reimbursement rates by Oct. 1, 2023, and by Feb. 1, 2024, Medicare reimbursement rates needed to be incorporated into the hospitals'

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federally required machine-readable files per the guidelines in the Medicare Rates Clarification document.[12]

1. **Quality Rating**

   - Good - Medicare reimbursement rates are available for download, posted by item and service, incorporated in the hospital's required federal price transparency machine-readable file as a payer, and updated within the past 365 days.

   - Fair - Medicare reimbursement rates are available for download, posted by item and service, updated within the past 365 days, but are listed in a separate table in the hospital's required federal price transparency machine-readable file or available in a separate downloadable file.

   - Poor - Medicare reimbursement rates are either unavailable, not posted by item and service, or not updated within the past 365 days.

D. **Overall Quality Rating**

   Determined by quality ratings of the downloadable file, the shoppable service tool or display, and SB 23-252 Medicare reimbursement rates

   - Good – Quality rating of Good in all three areas, the downloadable file, the shoppable service display or tool, and SB23-252 Medicare reimbursement rates.

   - Fair – Meets one of the following requirements

     o The SB 23-252 Medicare reimbursement rates quality rating is Good, and the downloadable file and the shoppable service display or tool have at least one quality rating of Fair but do not have a quality rating of Poor.

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[12] Medicare Rates Clarification - November 2023. (2023) https://hcpf.colorado.gov/sites/hcpf/files/SB23%20-%20252%20Medicare%20Rates%20Clarification%20Updated%2011.1.2023.pdf

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- The SB 23-252 Medicare reimbursement rates quality rating is Fair, and the downloadable file and the shoppable service display or tool does not have a quality rating of Poor.

- The SB 23-252 Medicare reimbursement rates quality rating is either Poor or Fair, and both the downloadable file and the shoppable service display or tool have quality ratings are Good.

- Poor – At least one quality rating of Poor in one of the three areas. If the only Poor quality rating is for SB23-252 Medicare reimbursement rates, the downloadable file and the shoppable service display or tool have at least one quality rating of Fair.

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## Appendix B: Additional Tables

*Table 5: Downloadable File Criteria Met by Children's, General, and Critical Access System Classification August 2025*

| Downloadable File Category | Total | System | Independent General | Independent Critical Access |
|---|---|---|---|---|
| Machine Readable | 62.1% | 63.3% | 44.4% | 65.5% |
| Posted or Updated Date Within 365 | 92.0% | 100.0% | 88.9% | 79.3% |
| Code and Code Type | 100.0% | 100.0% | 100.0% | 100.0% |
| Description | 98.9% | 100.0% | 88.9% | 100.0% |
| Setting | 98.9% | 100.0% | 100.0% | 96.6% |
| Drug Measurement | 85.1% | 89.8% | 100.0% | 72.4% |
| Gross Charges | 100.0% | 100.0% | 100.0% | 100.0% |
| Discounted Cash | 98.9% | 100.0% | 100.0% | 96.6% |
| De-Identified Minimum & Maximum | 96.6% | 100.0% | 88.9% | 93.1% |
| Negotiated Rates | 81.6% | 77.6% | 66.7% | 93.1% |
| Plans | 95.4% | 100.0% | 100.0% | 86.2% |

*Table 6: Downloadable File Criteria Met by Category by Long-Term Care Rehabilitation, and Psychiatric Hospitals August 2025*

| Downloadable File Category | Total | Long-Term Acute Care | Psychiatric | Rehabilitation |
|---|---|---|---|---|
| Machine Readable | 64.3% | 66.7% | 75.0% | 50.0% |
| Posted or Updated Date Within 365 days | 100.0% | 100.0% | 100.0% | 100.0% |
| Code and Code Type | 100.0% | 100.0% | 100.0% | 100.0% |
| Description | 100.0% | 100.0% | 100.0% | 100.0% |
| Setting | 100.0% | 100.0% | 100.0% | 100.0% |
| Drug Measurement | 100.0% | 100.0% | 100.0% | 100.0% |
| Gross Charges | 100.0% | 100.0% | 100.0% | 100.0% |
| Discounted Cash | 85.7% | 83.3% | 100.0% | 75.0% |
| De-Identified Minimum & Maximum | 100.0% | 100.0% | 100.0% | 100.0% |
| Negotiated Rates | 92.9% | 100.0% | 100.0% | 75.0% |
| Plans | 85.7% | 100.0% | 50.0% | 100.0% |

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